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16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

13 KRISTINA KERLUS, individually,	14) Case No.: 2:24-cv-02352-APG-DJA
15 Plaintiffs,	16)
17 v.	18) PLAINTIFF'S STIPULATION, REQUEST
19 DR. JENNIFER CORNEAL, in her	20) AND ORDER EXTENDING TIME TO
20 individual capacity; A. SANTOS, in her	21) RESPOND TO DEFENDANT LVMPD'S
21 individual capacity; CITY OF LAS VEGAS,	22) MOTION TO DISMISS
22 a Municipal corporation; and COUNTY OF	23) [ECF No. 44]
23 CARK, a Municipal corporation; LAS	24)
24 VEGAS METROPOLITAN POLICE	25) (First Request)
25 DEPARTMENT, jointly and severally,	26)
26 Defendants.	27)

27 Plaintiff Kristina Kerlus (“Plaintiff”) and Defendant Las Vegas Metropolitan Police
 28 Department (“LVMPD”), by and through their respective counsel, hereby stipulate and agree
 as follows:

1 1. Plaintiff filed her Complaint on December 17, 2024. [ECF No. 1]. On December
 2 19, 2024, Plaintiff filed a First Amended Complaint (“FAC”). [ECF No. 7].

3 2. LVMPD filed its Motion to Dismiss the FAC on May 27, 2025. [ECF. No. 44].

4 3. The current deadline for Plaintiff to respond to the Motion to Dismiss is June 10,
 5 2025.

6 4. Given the unusual circumstances surrounding the filing of the Complaint and the
 7 FAC, the concurrent briefing on Plaintiff’s motion for an extension of time to serve LVMPD
 8 (ECF No. 40), and the complexity of the *Monell* claims at issue in LVMPD’s Motion to
 9 Dismiss, Plaintiff’s counsel requires additional time to respond.

10 5. Upon agreement of all parties hereto, the undersigned respectfully request that this
 11 Court grant a 14-day extension of time, up to and including June 24, 2025, to respond to
 12 LVMPD’s Motion to Dismiss.

13 6. This is the first request for an extension of time to respond to LVMPD’s Motion to
 14 Dismiss.

15 7. This Stipulation is entered into in good faith and not for the purposes of delay.

16 DATED this 4th day of June, 2025.

17 By: /s/ Paul S. Padda
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20 By: /s/ Lyssa S. Anderson
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24 **ORDER**

25 IT IS SO ORDERED.


 26 CHIEF U.S. DISTRICT JUDGE

27 Dated: June 5, 2025